

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES,

v.

JOSEPH CAMMARATA, *et al.*,

Defendants.

Civil Action No. 2:21-cr-00427

Hon. Chad F. Kenney, U.S.D.J.

**Unopposed Motion to Amend Conditions of Release to Permit Travel**

Defendant Joseph Cammarata, by and through the undersigned counsel, respectfully requests that his conditions of release pending trial be amended to permit him to travel to Boston, Massachusetts, on January 17, 2022, returning January 18, 2022, for the purposes of taking his son to Boston University. In support of the motion, Mr. Cammarata states as follows.

**I. Relevant Background**

1. On October 28, 2021, a grand jury sitting in the Eastern District of Pennsylvania issued an indictment charging Mr. Cammarata with one count of conspiracy to commit mail fraud and wire fraud, in violation of 18 U.S.C. § 1349. (Dkt. No. 1.)

2. On November 3, 2021, Mr. Cammarata was arrested in the Southern District of Florida. On November 9, 2021, after a hearing, a Magistrate Judge sitting in the Southern District of Florida set conditions for Mr. Cammarata's release pending trial. Those conditions of release included that Mr. Cammarata reside at the home of his parents in Staten Island, New York, and that his travel be "restricted to the EDNY, SDNY, EDPA for case related purposes and, upon proper advance notice of travel plans to Pretrial Services, to the SDFL to meet with counsel." (Dkt. No. 14, at 25, 27.) The order also directed Mr. Cammarata to submit to location monitoring technology at the discretion of Pretrial Services, and Mr. Cammarata has been fitted with a GPS monitoring device. (Dkt. No. 14, at 27.)

3. On December 23, 2021, in response to concerns regarding exposure to COVID-19 in the home of Mr. Cammarata's parents, the Hon. Scott Reid, U.S.M.J., authorized Mr. Cammarata to temporarily relocate to his property in the Middle District of Pennsylvania. (Dkt. No. 19.) Mr. Cammarata has since returned to the home of his parents in Staten Island, New York.

4. On December 28, 2021, Mr. Cammarata made his initial appearance in this District. During that hearing, the Hon. Carol Sandra Moore Wells, U.S.M.J., entered an order generally incorporating the terms of the initial order entered in the Southern District of Florida. (Dkt. No. 21). In relevant part, the order further authorized Mr. Cammarata "to travel to the Eastern District of Pennsylvania for case related proceedings and meetings with the defendant's counsel, and to transit through New Jersey, upon proper advance notice to Pretrial Services." (Dkt. No. 21, at 2.) The order further anticipated that "the location of the defendant's home confinement may be altered as required by circumstances, on a temporary basis, to such locations and for such periods as are determined to be necessary by Pretrial Services, with sufficient advance notice to the government to provide it with an opportunity for challenge." (Dkt. No. 21, at 1.). The order did not, however, further authorize travel beyond those parameters.

## **II. Request for Leave to Travel**

5. Mr. Cammarata respectfully requests permission to travel with his son to Boston, Massachusetts, where his son is to begin his studies at Boston University. Mr. Cammarata proposes to drive to Boston on Monday, January 17, 2022, to spend the night in Boston, and to return to the home of his parents in Staten Island on Tuesday, January 18, 2022. Mr. Cammarata further proposes to provide Pretrial Services with a complete itinerary, his planned route of travel and anticipated departure and arrival times, and the location where he proposes to stay in Boston on the night of January 17, 2022, in advance of such travel.

6. During the proposed trip, Mr. Cammarata would remain under GPS monitoring, and abide by all directions and conditions that Pretrial Services may require during the trip, including with respect to curfew.

7. Counsel for Mr. Cammarata has conferred with the U.S. Attorney's Office and Pretrial Services, who do not object to the proposed travel.

### **III. Conclusion**

For the foregoing reasons, Mr. Cammarata respectfully requests that this Court enter the attached proposed order amending Mr. Cammarata's conditions of release to authorize him to travel to Boston, Massachusetts, under the conditions set forth above.

Respectfully submitted,

Dated: January 13, 2022

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By: /s/ Antonio M. Pozos

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Attorneys for Defendant  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Unopposed Motion to Amend Conditions of Release to Permit Travel has been served on counsel of record for all parties via the Court's CM/ECF system.

Dated: January 13, 2022

/s/ Antonio M. Pozos  
Antonio M. Pozos